

The SCA takes health & safety seriously by adhering to the highest environmental standards

The SCA understands that health and safety questions and concerns may arise during school construction. City, State, and Federal agencies may have regulatory authority with respect to the management of environmental issues during construction activity. The information below describes the protocols that the SCA follows to meet legally required standards and protect the school environment.

SCA's Asbestos Abatement in Schools during Construction

Prior to construction, the SCA's Environmental Consultants perform a full review of all available existing data relating to the project. Materials which are historically documented as asbestos-containing material (ACM) or non-ACM are reviewed. Upon completion of the data review, a field survey is conducted that includes collection and analyses of samples. The scope of the asbestos survey is dependent on the type and size of the proposed project and is conducted by certified personnel of pre-Approved, Federal, State, and City-Licensed environmental consulting firms. Areas which are documented as ACM or non-ACM, along with the information gathered from the file review, are incorporated into an Asbestos Scope Survey Report.

Upon receipt of the final design drawings for the school, detailed specifications and the final survey and drawings are prepared by the SCA's Environmental Consultant. These documents provide the quantities and locations of suspect or known ACM, along with the appropriate methodologies for asbestos abatement.

When construction work begins:

- Asbestos abatement is **never** done when the building is occupied.
- An Independent Environmental Consultant and the SCA's Industrial Hygienists provide oversight of the abatement activities

- At the completion of the asbestos abatement, both visual inspection and post-abatement air monitoring are conducted and results are compared to clearance criteria established by federal, state, and city regulations.
- Once air samples meet clearance criteria, at the end of the abatement effort, an additional inspection of the work area is performed by the SCA's Environmental Consultant.
- A Re-occupancy Letter is issued by the SCA's Environmental Consultant to the principal and custodial staff indicating that abatement has been completed and final air clearance has been achieved.

SCA's Lead-Based Paint Policy during Construction

The SCA's policies and operating guidelines are based on the Environmental Protection Agency (USEPA) and Occupational Safety and Health Administration (OSHA) requirements as they relate to lead in construction.

It is the SCA's policy to assume that all interior painted surfaces are coated with lead-based paint. Therefore, all work that disturbs painted surfaces must comply with USEPA and OSHA lead-based paint requirements. Other applicable sections of federal, state, and city regulations governing painted building surfaces are also included in SCA protocols.

When construction work begins:

- Dust control precautions are used to prevent possible spread of dust and reduce worker exposure during construction.
- SCA standard construction specifications require the installation of dust barriers, prior to the start of construction activities, daily cleanup, including wet mopping, wet wiping and HEPA vacuuming.
- Pre-qualified SCA Environmental Consultants utilizing EPA and DEP Certified personnel perform wipe sampling at the end of construction. The SCA uses clearance criteria established by the EPA prior to re-occupancy of classrooms where a

child age 6 years or younger may be present, including 1st grade, kindergarten, pre-K classrooms, Lyfe Centers, and also Special Ed and Pregnant Student programs. Depending on the nature of the construction work, common areas such as cafeterias and gymnasiums that are frequented by these students are also tested.

- A Re-occupancy Letter is issued by the SCA's Environmental Consultant to the principal and custodial staff indicating that wipe sampling clearance has been achieved.

PCBs in Caulk in Schools during Construction

Polychlorinated biphenyls (PCBs) are a group of man-made chemicals that were used in many building products to increase their strength and flexibility. PCBs were added to caulking and elastic sealant materials, particularly from 1950-1977. Therefore, any structure built or renovated during that period of time is likely to contain these compounds. When caulk with PCBs is disturbed, it may produce dust that contains PCBs.

The New York State Education Department (SED) has recently published protocols for properly managing caulk containing PCBs that will be disturbed during building renovation and maintenance. Accordingly, the SCA has developed and implemented stringent dust control practices to minimize the potential exposure to PCB-containing dust during construction:

- SCA applies the new SED protocol to all school buildings built prior to 1985.
- SCA assumes that all caulks present in these buildings contain PCBs.
- SCA employs the same dust control measures for PCBs as is used for lead dust control. The protocols require rigorous dust control measures during the work, followed by cleaning and inspection at the conclusion of every work shift.
- All repairs that disturb caulk, such as window removal and replacement, are conducted by workers who use safe work practices to minimize dust.
- After completion of renovation or demolition that involves the disturbance of PCB caulking material, soil adjacent to the school building is sampled, by a qualified environmental professional to test for the presence of PCBs and remediate if required.

Mold Remediation in Schools during Construction

Mold (commonly referred to as mildew) is a form of fungi and is present almost everywhere in indoor and outdoor environments. Indoors, mold growth is encouraged by warm and humid conditions. Mold needs moisture to grow and becomes a problem only where there is water damage, high humidity, or dampness.

In May, 1993, the New York City Department of Health & Mental Hygiene issued guidelines for assessing and remediating indoor mold that are strictly followed by SCA.

When a complaint or concern regarding the potential presence of mold is reported as a result of construction-related activities:

- The SCA's trained Environmental Consultants perform an assessment of potential mold growth, water damage, and musty odors in the building. Equipment is also employed to view spaces in ductwork or behind walls, as well as to measure moisture in building materials that may encourage mold growth.
- The SCA's Environmental Consultants conduct a comprehensive field survey of the suspected area and provide a detailed inventory of all effected material.
- Using the information gathered during the field survey, remedial measures are recommended for immediate implementation. These recommendations typically include: thorough cleanup, drying, and/or removal of water-damaged material. In all instances, any source of water must be fully investigated and remediated.
- Upon satisfactory completion of the work and final inspection, the SCA's Industrial Hygienist issues written notification to school administration that the space is suitable for reoccupancy.

If you have any questions about environmental issues during construction, please email ercmailbox@nycsca.org.